

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MASSACHUSETTS**

INSITUFORM TECHNOLOGIES, INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 04-10487GAO
)	
AMERICAN HOME ASSURANCE)	
COMPANY,)	
)	
Defendant.)	

**JOINT STATEMENT OF THE PARTIES
PURSUANT TO FED. R. CIV. P. 16 AND L.R. 16.1**

The parties hereby jointly submit the following statement pursuant to Fed. R. Civ. P. 16 and L.R. 16.1, including a joint discovery plan and proposed pretrial schedule.

A. Discovery Plan

- | | | |
|----|---|------------------|
| 1. | Parties' automatic disclosures served: | January 30, 2006 |
| 2. | Disclosure of plaintiff's expert, if any, including report: | March 31, 2006 |
| 3. | Completion of written discovery: | April 14, 2006 |
| 4. | Disclosure of defendant's expert, if any, including report: | May 31, 2006 |
| 5. | Completion of depositions, including experts: | June 30, 2006 |

B. Schedule for Filing of Motions

- | | | |
|----|---|------------------------------------|
| 1. | Further motions for summary judgment filed: | July 31, 2006 |
| 2. | Pretrial motions filed: | [To Be Determined
By The Court] |
| 3. | Final pretrial conference held: | [To Be Determined] |

By The Court]

C. Trial

1. Jury trial on all remaining issues:

[To Be Determined
By The Court]

D. Certifications of Counsel and Parties

The parties are submitting separately to the Court their respective
certifications called for under L.R. 16.1(D)(3).

Respectfully submitted,

INSITUFORM TECHNOLOGIES, INC.

Respectfully submitted,

AMERICAN HOME
ASSURANCE COMPANY

By: /s/ Stanley A. Martin
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Date: January 23, 2006

Of counsel

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the within Joint Statement of The Parties Pursuant to Fed. R. Civ. P. 16 and L.R. 16.1 was served upon the attorney of record for the Defendant by virtue of electronically filing this document with the Court on the 23rd day of January 2006.

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